

VENABLE LLP
8010 Towers Crescent Drive, Suite 300
Vienna, Virginia 22182-2707
Telephone: (703) 760-1647
Facsimile: (703) 821-8949
Lawrence A. Katz

- and -

VENABLE LLP
Rockefeller Center
1270 Avenue of the Americas
New York, New York 10020
Telephone: (212) 983-3850
Facsimile: (212) 307-5598
Edward A. Smith
Carol Lynn H.G. Callari

Attorneys for RK Chevrolet/RK Auto Group

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	X
	:
In re	: Chapter 11
	:
GENERAL MOTORS CORP., <i>et al.</i>	: Case No. 09-50026 (REG)
	:
	: (Jointly Administered)
Debtors.	:
	:
-----	X

**PROTECTIVE OBJECTION OF RK CHEVROLET/RK AUTO GROUP
TO DEBTORS' PROPOSED CURE AMOUNTS**

RK Chevrolet/RK Auto Group ("RK Chevrolet") files this protective objection regarding cure amounts proposed by the Debtors with respect to executory contracts they propose to assume and assign. In support of its protective objection, RK Chevrolet states as follows:

1. RK Chevrolet is a party to an executory contract with one or more of the Debtors.

2. By Notice dated June 5, 2009 (the "Assumption Notice"), the Debtors informed certain suppliers of goods and services of their intent to assume and assign executory contracts and of the cure amount, if any, that must be paid by the Debtors in connection therewith.

3. RK Chevrolet may or may not have received a copy of the Assumption Notice. RK Chevrolet is filing this protective objection in an abundance of caution in the event that the Debtors intend to assume and assign RK Chevrolet contracts but scheduled a cure amount with which RK Chevrolet does not agree.

4. RK Chevrolet will work diligently with the Debtors to try to resolve any cure amount issues without Court intervention but reserves all rights in the event that an agreement cannot be reached.

Dated: June 15, 2009

Respectfully submitted,

VENABLE LLP

/s/ Carollynn H.G. Callari

Carollynn H.G. Callari

Edward A. Smith

Rockefeller Center

1270 Avenue of the Americas

New York, New York 10020

Telephone: (212) 983-3850

Facsimile: (212) 307-5598

-and-

Lawrence A. Katz

8010 Towers Crescent Drive, Suite 300

Vienna, Virginia 22182-2707

Telephone: (703) 760-1600

Facsimile: (703) 821-8949

Email: lakatz@venable.com

Counsel to RK Chevrolet/RK Auto Group